

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

GEORGE S. MAY  
INTERNATIONAL COMPANY,

Plaintiff,

-vs-

XCENTRIC VENTURES, LLC,  
RIP-OFF REPORT.COM  
BADBUSINESSBUREAU.COM,  
ED MAGEDSON, VARIOUS  
JOHN DOES, JANE DOES AND  
ABC COMPANIES,

Defendants.

Case Number

04C6018

Judge

NDMS/E

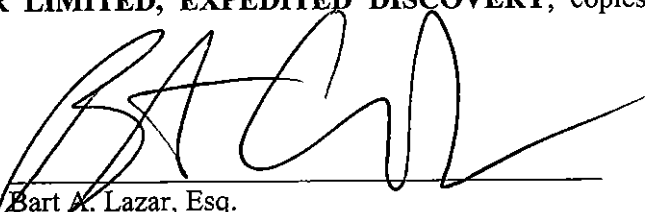
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OCT 12 2004

NOTICE OF MOTION

To: James K. Borgia, Esq.  
David O. Yuen, Esq.  
Tressler, Soderstrom, Maloney & Priess  
233 South Wacker Drive, 22<sup>nd</sup> Floor  
Chicago, Illinois 60606-6308

PLEASE TAKE NOTICE that on October 8, 2004, at 9:30 a.m., we will appear before the Honorable Charles R. Norgle, or any Judge sitting in his place or stead in Room 2341 in the United States District Court of Illinois, 219 South Dearborn Street, Chicago, Illinois 60604, and will then and there present **MOTION FOR LEAVE TO FILE INSTANTER A BRIEF IN EXCESS OF FIFTEEN (15) PAGES** and **PLAINTIFF'S MOTION FOR LIMITED, EXPEDITED DISCOVERY**, copies of which are hereby attached and served upon you.

Dated: October 6, 2004

  
Bart A. Lazar, Esq.  
Rachel M. Kindstrand, Esq.  
Seyfarth Shaw LLP  
55 East Monroe, Suite 4200  
Chicago, IL 60603  
(312) 346-8000  
Attorneys for Plaintiff  
GEORGE S. MAY INTERNATIONAL COMPANY

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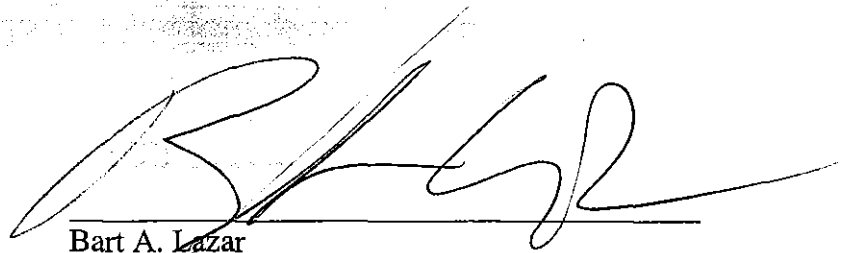
**CERTIFICATE OF SERVICE**

Bart A. Lazar, hereby certify that on the date indicated below, a copy of the foregoing  
**NOTICE OF MOTION; MOTION FOR LEAVE TO FILE INSTANTER A BRIEF IN  
EXCESS OF FIFTEEN (15) PAGES; PLAINTIFF'S MOTION FOR LIMITED,  
EXPEDITED DISCOVERY; (PROPOSED) ORDER GRANTING PRELIMINARY  
INJUNCTION AND EXPEDITED DISCOVERY; DECLARATION OF CHARLES E.  
BLACK IN SUPPORT OF MOTION FOR A PRELIMINARY INJUNCTION;  
DECLARATION OF RACHEL M. KINDSTRAND; and PLAINTIFF GEORGE S. MAY'S  
MEMORANDUM OF LAW IN SUPPORT OF ITS MOTION FOR A PRELIMINARY  
INJUNCTION.**

were served on the following opposing counsel by hand delivery.

James K. Borgia, Esq.  
David O. Yuen, Esq.  
Tressler, Soderstrom, Maloney & Priess  
233 South Wacker Drive, 22<sup>nd</sup> Floor  
Chicago, Illinois; 60606-6308

on the 6<sup>th</sup> day of October, 2004.



Bart A. Lazar

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

GEORGE S. MAY  
INTERNATIONAL COMPANY,

Plaintiff,

-vs-

XCENTRIC VENTURES, LLC,  
RIP-OFF REPORT.COM  
BADBUSINESSBUREAU.COM,  
ED MAGEDSON, VARIOUS  
JOHN DOES, JANE DOES AND  
ABC COMPANIES,

Defendants.

Case Number 04-C-6018

Judge Norgle

**DOCKETED**

OCT 12 2004

**MOTION FOR LEAVE TO FILE *INSTANTER* A BRIEF  
IN EXCESS OF FIFTEEN (15) PAGES**

NOW Comes Plaintiff, GEORGE S. MAY INTERNATIONAL COMPANY ("GSMIC"),  
by its attorneys Seyfarth Shaw LLP, and states in support of its Motion for Leave to File *Instanter*  
A Brief In Excess of Fifteen Pages, and hereby states as follows:

1. Plaintiff GSMIC has prepared a Brief in Support of Its Motion for Preliminary  
Injunction, a copy of which is attached to this Motion;

2. During the hearing on September 24, 2004, Defendants raised numerous  
objections to this Court's entry of a Temporary Restraining Order, including the argument that  
this Court lacked personal jurisdiction over the Defendants;

3. Plaintiff has asserted four counts in its Complaint, including violations of the  
Lanham Act, common law defamation and trade libel claims, and claims under the Illinois  
Uniform Deceptive Trade Practices Act and the Illinois Consumer Fraud and Deceptive Business  
Practices Act;

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4. In order to adequately address Defendants' objections and adequately support Plaintiff's Motion for a Preliminary Injunction, Plaintiff requires more than the fifteen pages allotted per Local Rule 7.1.

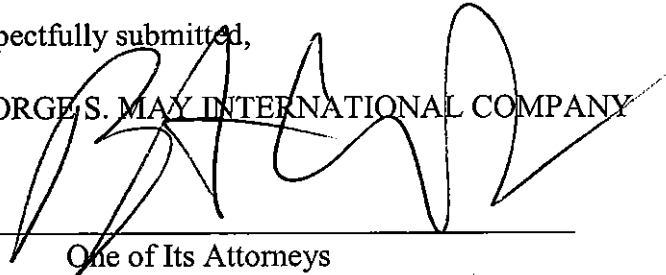
5. Specifically, Plaintiff asks this Court for leave for an additional ten pages, not including exhibits and other attachments.

WHEREFORE, Plaintiff GEORGE S. MAY INTERNATIONAL COMPANY respectfully requests that this Court grant Its Motion for Leave to File *Instantly* a Brief In Excess of Fifteen (15) Pages.

**DATED: October 6, 2004**

Respectfully submitted,

GEORGE S. MAY INTERNATIONAL COMPANY

By:   
One of Its Attorneys

Attorneys for Plaintiff:

Bart A. Lazar, Esq.  
Rachel M. Kindstrand, Esq.  
**SEYFARTH SHAW LLP**  
55 East Monroe, Suite 4200  
Chicago, Illinois 60603  
Telephone: (312) 346-8000  
Facsimile: (312) 269-8869  
Firm No. 90747